

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

REMARKS

This Amendment is responsive to the Office Action mailed January 4, 2005. Applicants have amended claims 3-5, 7, 13, 17, 20, 22-24, 26, 29, 31, 34, 35, 38, 40-42, 44, and 64. Claims 1-66 remain pending in the present application.

Objection to Disclosure

The Examiner identified two minor numbering errors in the disclosure. Applicants have amended the specification to correct these typographical errors. Accordingly, Applicants respectfully request withdrawal of the objections to the disclosure.

Objection to Drawings

The Examiner objected to the drawings under 37 C.F.R. 1.83(a). The Examiner asserted that the drawings do not comply with Rule 83, alleging that the "system module" and "client interface" recited in various claims are not shown in the drawings. Applicants respectfully traverse the Examiner's objection to the drawings.

The drawings clearly show a client interface and multiple system modules. As explained in Applicants' disclosure, the client interface may be a command line interface (CLI). FIGS. 2 and 3 each show a CLI module. Hence, FIGS. 2 and 3 likewise show a client interface, inasmuch as a CLI module is an example of a client interface.

Applicants' disclosure also describes a variety of system modules. Examples include chassis module 26, device configuration module 28, and routing protocol module 30 shown in FIG. 2, and the various software modules 36 shown in FIG. 3. Accordingly, FIGS. 2 and 3 clearly show a system module, inasmuch as modules 26, 28, 30 and 36 are examples of a system module.

There is no requirement in Rule 83 that the drawings use verbatim language in reference to structural elements that correspond to features described in the specification and set forth in the claims. For example, if a claim recited a fastening element, and the drawings depicted a particular example of a fastening element, such as a screw or nail, the drawings would certainly be compliant with Rule 83.

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

In view of the illustration of a client interface and system module in FIGS. 2 and 3, Applicants respectfully request withdrawal of the objection to the drawings.

Claim Rejections Under 35 U.S.C. § 112, second paragraph

In the Office Action, the Examiner rejected claims 20, 29, 34, 38, 52, 58, 64, 65, 66 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants respectfully traverse this rejection.

With respect to claims 38, 52, 58, 64, 65, and 66, the Examiner asserted that there is insufficient antecedent basis for the term "client interface." Applicants respectfully submit that the Examiner is mistaken. In the pertinent claims, the first instance of "client interface," in line 2, is properly introduced with the indefinite article "a." Accordingly, there is no problem with antecedent basis for purposes of claim definiteness under 35 U.S.C. 112, second paragraph.

Applicants therefore must assume that the Examiner has taken issue with proper antecedent basis in the disclosure, which is more properly an issue to be raised in terms of adequate written description under 35 U.S.C. 112, first paragraph. Yet, the disclosure clearly provides sufficient support for the term "client interface." Of course, the claims as originally filed are themselves capable of providing adequate support. In the present application, however, the detailed description provides extensive support for this features.

At page 6, lines 5-7, for example, the detailed description states that the management server module 32 communicates with one or more "client interface" modules, and describes a command line interface (CLI) module as an example. The detailed description then proceeds to describe the operation of a CLI module within a routing engine. Hence, a CLI module is an example of a client interface. In light of the language of claims 38, 52, 58, 64, 64 and 66, and the detailed description, it is evident that there is no antecedent basis issue, whether arising under section 112, second paragraph, or section 112, first paragraph.

With respect to claims 20, 29, and 34, the Examiner asserted that there is insufficient antecedent basis for the term "processor readable medium." Again, Applicants respectfully submit that the Examiner is mistaken. The term "processor readable medium" is properly

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

introduced in the claims with the indefinite article "a." Moreover, the claims and the detailed description provide ample support for such a feature.

At page 2, lines 30-31, for example, the detailed description states that some embodiments of the invention are directed to computer-readable media. In addition, at page 4, line 28, to page 5, line 15, the detailed description describes various media for storage of "information such as processor-readable instructions, data structures, program modules or other data." In addition, the detailed description refers to a variety of software modules used within a router. Clearly, the claims raise no antecedent basis issues.

Claim Rejections Under 35 U.S.C. § 101

In the Office Action, the Examiner rejected claims 20, 29, 34, 38, 52 and 58 under 35 U.S.C. 101 "in view of the specification." Applicants respectfully traverse the rejection.

In support of the rejection of claims 20, 29, and 34, the Examiner seemed to characterize the claimed invention as being directed merely to non-functional descriptive subject matter. The Examiner's assertion is incorrect.

Claims 20, 29, and 34 recite a processor-readable medium "comprising instructions for causing a programmable processor to" perform a set of operations. For example, claim 20 specifies that the processor-readable medium comprises instructions for causing a programmable processor to receive output in a format describing a type of the output, query a server selected as a function of the type of the output, and provide a response from the server to a user. It is unclear what part of claim 20 could possibly be considered non-functional descriptive material.

Claims 20, 29 and 34 recite an article of manufacture and not software *per se*. The inventions defined by claims 20, 29, 34 are recited in terms of an article of manufacture, and clearly qualify as statutory subject matter under section 101. The format of claims 20, 29, and 34 is well-accepted as a way to define a particular type of article of manufacture, i.e., a computer- or processor-readable medium, in terms of instructions carried on the medium.

In her analysis, the Examiner referred to passages in Applicants' specification concerning the various types of computer-readable media that may be used. However, Applicants do not understand the point of the Examiner's remarks, as the specification does not in any way contemplate nonfunctional, descriptive material.

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

Rather, at page 4, line 28, to page 5, line 15, the specification describes various data storage media storing information such as "processor-readable instructions" and states that communication media may likewise carry computer-readable instructions. The terms "computer" and "processor" are generally used interchangeably in the arts to refer to a computer processor. It is well accepted that, when functional descriptive material, such as processor-readable instructions, are formed on a computer-readable medium, the resulting medium is statutory. Accordingly, Applicants are confused by the basis for the rejection under section 101.

Likewise, Applicants can find no basis for the rejection of claims 38, 52, and 58, which are directed to "devices." In support of the rejection of claims 38, 52, and 58 under section 101, the Examiner stated that the claimed devices are directed to functional descriptive material. Yet, the Examiner acknowledged that the claims define "devices," which clearly fall within the scope of statutory subject matter under section 101 as a "machine."

The Examiner broadly asserted that the "specification . . . indicates that the recited device consists only of computer programs." However, this seems to ignore the fact that the entire specification describes network routing devices. Although the network routing devices may include or operate in conjunction with software, they are not directed to the software *per se*. Rather, the claims very clearly recite routing devices having components that carry out specific functions, whether implemented in software or otherwise.

In summary, Applicants are confused by the Examiner's rejection of claims 20, 29, 34, 38, 52, and 58 under section 101, and requests either withdrawal of the rejection or further clarification.

Claim Rejections Under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1, 2, 6, 7, 10, 20, 21, 25, 26, 38, 39, 43, 44, and 64 under 35 U.S.C. 102(b) as being anticipated by Abjanic (U.S. Patent No. 6,732,175). Applicants respectfully traverse this rejection. Abjanic fails to disclose each and every feature of the claimed invention, as required by 35 U.S.C. 102(b), and provides no teaching that would have suggested the desirability of modification to include such features.

Abjanic fails to disclose a method, as set forth in claims 1, 2, 6, 7, and 10, comprising receiving output from a router in a format describing a type of the output, querying a server

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

selected as a function of the type of the output, and providing a response from the server to a user. Similarly, Abjanic does not disclose a processor-readable medium comprising instructions for causing a programmable processor to perform a similar method, as defined by amended claims 20, 21, 25, and 26.

Abjanic likewise does not disclose a routing device, as defined by claims 38, 39, 43 and 44, comprising a client interface to receive an operational request from a network router client, and a router system module to process the operational request and to provide output to the client interface in a format that describes a type of the output, wherein the client interface is configured to query a server selected as a function of the type of the output and to provide a response from the server to the network router client.

In addition, Abjanic fails to disclose a system comprising a client interface to receive an operational request from a network router client, a router system module to process the operational request and to provide output to the client interface in a format that describes a type of the output, and a server to provide a response to the client interface, wherein the client interface is configured to query the server and to provide the response to the network router client, as set forth in claim 64.

Abjanic describes a content-based message director 145 that receives messages from network clients 110, 120, 132, parses XML content in the messages, and directs the messages to selected servers 150, 160, 170 within a data center 135 based on the message content. Hence, Abjanic is concerned with the routing or directing of messages between network clients and servers within the data center according to message content.

Contrary to the requirements of Applicants' claims, Abjanic does not disclose or suggest receiving output from a router in a format describing a type of the output. Instead, the content-based message director 145 receives XML content from network clients 110, 120, 132. In view of this difference alone, Abjanic does not anticipate claims 1, 2, 6, 7, 10, 20, 21, 25, 26, 38, 39, 43, 44, and 64.

In addition, Abjanic does not disclose querying a server selected as a function of the type of the output from a router. Again, the messages parsed by the message director 145 are received from network clients, and not a router. Moreover, Abjanic directs messages to servers 150, 160, 170 based on the content of the output, and not the type of the output.

Application Number 09/963,806

Amendment in Response to Office Action mailed January 4, 2005

For example, Abjanic describes content based switching decision logic 316 that selects a server based on a match between the content of a message and a predetermined configuration pattern. Hence, in Abjanic, XML serves as an aid in parsing the content of the message. Abjanic makes no mention of querying a server selected as function of output type. For this reason, Abjanic does not anticipate Applicants' claims.

As a further difference, the Examiner acknowledged that Abjanic fails to disclose providing a response from the server to a user. The Examiner stated that such a feature would be inherent in the Abjanic system. Application respectfully disagrees. In particular, given the fundamental differences identified above, Abjanic would not select a server as a function of the type of output received from a router. Accordingly, there would be no basis to conclude that receipt of a response from such a server would be inherent.

In summary, according to the claims, the "output" that is provided in a format describing a type of the output is obtained from a router, and not from a network client, as in the Abjanic reference. Moreover, the queried server is selected as a function of the type of output obtained from the router, rather than message content, as in the Abjanic reference. In view of these differences, it should be clear that the Abjanic teachings are inapplicable to the inventions defined by 1, 2, 6, 7, 10, 20, 21, 25, 26, 38, 39, 43, 44, and 64.

Abjanic also fails to disclose the features set forth in various dependent claims, as discussed below.

With respect to claim 2, 21 and 39, for example, Abjanic does not specify that an output received from a router is a numeric address. Again, the message received from a network client in Abjanic is not output from a router. In addition, the output of content-based message director is not a numeric address. Rather, Abjanic describes the switching of a message to a server associated with a particular network address. The message is not a numeric address.

With respect to claims 7, 26, and 44, Applicants can find no mention whatsoever of a feature within the Abjanic system by which output from a router would be rendered in text format before querying a server. In the passage identified by the Examiner, Abjanic describes the formatting of a message in XML format, but not then rendering the message as text. Clearly, the Abjanic reference does not describe rendering a message in a text format different from an initial format of the message, as set forth in the claims, as amended.

Application Number 09/963,806

Amendment in Response to Office Action mailed January 4, 2005

Claim Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 3, 4, 11-13, 16-17, 22, 23, 29, 30, 31, 34, 41, 52, 58, 65, and 66 under 35 U.S.C. 103(a) as being unpatentable over Abjanic in view of Ansell et al. (U.S. Patent No. 6,826,617); rejected claims 5, 24 and 42 under 35 U.S.C. 103(a) as being unpatentable over Abjanic in view of Mahon et al. (U.S. Patent No. 6,587,876); rejected claims 8, 14, 18, 27, 32, 40 and 45 under 35 U.S.C. 103(a) as being unpatentable over Abjanic in view of Tout (U.S. Patent No. 6,829,653); rejected claims 9, 15, 19, 28, 33, 37, 46, 47, 53 and 59 as being unpatentable over Abjanic in view of Chen (U.S. Patent No. 6,392,997); rejected claims 35 and 36 under 35 U.S.C. 103(a) as being unpatentable over Abjanic in view of Tan (U.S. Patent No. 6,314,469); and rejected claims 48-51, 54-57, and 60-63. Applicants respectfully traverse the various rejections under section 103. Inasmuch as all rejections rely on Abjanic as a primary reference, they should be withdrawn for at least the reasons discussed above with respect to the rejection under section 102. Moreover, the additional references applied by the Examiner provide no teaching sufficient to overcome the basic deficiencies in Abjanic.

Claims 3, 4, 11-13, 16-17, 22, 23, 29, 30, 31, 34, 41, 52, 58, 65, and 66

With respect to claims 3 and 22, the Examiner acknowledged that Abjanic fails to disclose querying a name server, receiving from the name server a symbolic name associated with a numeric address and providing the symbolic name to a user. With respect to claims 4, 23 and 41, the Examiner acknowledged that Abjanic fails to disclose querying an owner database, receiving from the owner database an identification of an owner associated with the numeric address, and providing the identification of the owner to a user.

The Examiner cited Ansell et al., however, as teaching domain name resolution to estimate geographic location information. The Examiner asserted that it would have been obvious to retrieve a symbolic name for an IP address in order to obtain domain names that are easier to remember than IP addresses, or to receive an owner identification for purposes of export control, import control, marketing or business advantages.

Applicants respectfully disagree with the Examiner's conclusion of obviousness. It is unclear why modification of the Abjanic system to include domain name resolution or retrieval of owner information, as purportedly taught by Ansell et al., would have been obvious. Domain

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

name resolution is well known. Yet, there is still the question of why domain name resolution or owner retrieval would have been desirable in the Abjanic system, or how domain name resolution or owner retrieval would even fit into the Abjanic system.

Even if the Abjanic system were modified according to Ansell et al., the resulting system still would not conform to the requirements of Applicants' claims. Claims 3 and 22, as amended, more specifically require querying a name server selected as a function of the type of the output, receiving from the name server a symbolic name associated with the numeric address, and providing the symbolic name as the response to the user.

Amended claims 4, 23 and 41 specify querying an owner database selected as a function of the type of the output, receiving from the owner database an identification of an owner associated with the numeric address, and providing the identification of the owner as the response to the user. Abjanic and Ansell et al. provide no teaching that would have suggested such features. Therefore, the rejection of claims 3, 4, 22, 23, and 41 should be withdrawn.

With respect to claims 11-13 and 29-31, the Examiner asserted that Abjanic discloses receiving a numeric address in a self-describing format, cited Col. 7, lines 13-67. However, the table in that section of the Abjanic patent only shows information such as "bookstore.com" and "stockquote.com" in an XML format. The IP address information, e.g., "10.1.1.1," appears to be in a purely numeric format. Thus, director 145 in Abjanic directs messages based on patterns such as server identification, IP address, port number, and information parsed from XML tags. In Abjanic, the IP address is not in XML nor any other self-describing format. Accordingly, the Examiner's reliance on Abjanic seems to be misplaced.

The Examiner acknowledged that Abjanic fails to disclose querying a name server to resolve the numeric address to a symbolic name, and providing the symbolic name to a user, as required by claims 11-13 and 29-31. However, the Examiner again relied upon Ansell et al. to bridge the gap. Applicants respectfully submit that Ansell et al. provide no teaching sufficient to overcome that absence in Abjanic of the receipt of a numeric address in a self-describing format, as discussed above. The Examiner stated that it would have been obvious to modify Abjanic in view of Ansell et al. as it would be advantageous to query a server using the IP address in an XML format to reduce processing time. Yet, neither of these references actually teaches such a feature.

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

With respect to claims 16, 17, and 34, the Examiner stated that Abjanic discloses all of the requirements of the claims, except querying a domain name server to resolve an IP address to a symbolic name and providing the symbolic name to a user. However, the Examiner's interpretation of Abjanic is incorrect. Abjanic provides no teaching that would have suggested invoking a system module to process a command received in a user interface module, and receiving an XML-tagged IP address from the system module. The Examiner referred to output interface 320 in FIG. 3 of Abjanic. However, there is no mention in Abjanic of the generation of an XML-tagged IP address, whether by output interface 320 or any other component. Ansell et al. provides no teachings sufficient to overcome such deficiencies.

With respect to claim 52, the Examiner acknowledged that Abjanic fails to disclose a client interface configured to query a name server to resolve the numeric address to a symbolic name and to provide the symbolic name to the network router client. However, Abjanic also does not disclose a system module to process the operational request and to provide a numeric address to the client interface in a self-describing format, as previously discussed with respect to claims 11-13 and 29-31. Ansell et al. provides no teachings sufficient to overcome such deficiencies. For at least these reasons, the rejection should be withdrawn.

With respect to claim 58, the Examiner characterized Abjanic as disclosing a interface to receive an operational request from a network router client, and a system module to process the operational request and to provide an XML-tagged IP address to the client interface. The Examiner acknowledged that the Abjanic reference fails to disclose a client interface configured to query a domain name server to resolve the IP address to a symbolic name and to provide the symbolic name to the network router client, and cited Ansell et al. Applicants again contend that it would not have been obvious to modify Abjanic in view of Ansell et al., and that the resulting system would not conform to the claimed invention. Applicants further point out, however, that Abjanic does not disclose or suggest processing an operational request and to provide an XML-tagged IP address to the client interface, as previously discussed with reference to claims 16, 17 and 34.

With respect to claim 65, the Examiner characterized Abjanic as disclosing the invention substantially as claimed. The Examiner acknowledged that Abjanic does not disclose a name server to resolve the numeric address to a symbolic name and to provide the symbolic name to

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

the client interface. However, the Examiner cited Ansell et al. for such a teaching. Neither Abjanic nor Ansell et al. provides any teaching that would have suggested a system module that provide a numeric address to a client interface in a self-describing format, and a name server to resolve the numeric address to a symbolic name and to provide the symbolic name to the client interface.

Again, to the extent messages handled by the Abjanic system includes IP addresses, they are not presented in a self-describing format. Moreover, there is no plausible reason why it would have been obvious to provide a name server that resolves such a numeric address to a symbolic name and provides the symbolic name to a client interface in a system for handling message routing, such as that taught by Abjanic. Claim 66 further specifies a system module that provides an XML-tagged IP address and a domain name server to resolve the IP address, and is patentable over Abjanic and Ansell et al. for substantially the reasons expressed above.

Claims 5, 24 and 42

With respect to claims 5, 24, and 42, the Examiner apparently acknowledged that Abjanic does not disclose querying a router policy database, receiving from the database an identification of one or more router policies associated with a numeric address, and providing the identification to a user. Claims 5, 24, and 42, as amended, further specify that the router policy database is selected as a function of the type of the output, and that the identification is the response to the user. The Examiner cited Mahon as disclose a system for assigning policies, and concluded that it would have been obvious to modify the Abjanic system to include a client interface to retrieve and display policies in order to easily view and manage the system.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, it is unclear why one of ordinary skill in the art would have considered addition of a policy database, as purportedly taught by Mahon, in a system devoted to directed messages in support of business transactions. Moreover, it is clear that neither Abjanic nor Mahon contemplates selection of a router policy database as a function of the type of output provided by a router in a format describing the type of the output.

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

Claims 8, 14, 18, 27 32, 40 and 45

With respect to claims 8, 14, 18, 27, 32, 40 and 45, the Examiner acknowledged that Abjanic fails to disclose rendering output in a text form selected from the group of ASCII, UTF-8, and Unicode. However, the Examiner cited Tout as disclosing a system that provides lookup of domain names from an IP address, and conversion of IP numbers to standard formats. On this basis, the Examiner concluded that it would have been obvious to have a text format selected from the group consisting of ASCII, UTF-8, and Unicode "in order to allow . . . both non-English and English based system to send output in their own script or language."

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, it is unclear why one of ordinary skill in the art would have modified the Abjanic system to convert the XML format of a message to text, particularly when (1) Abjanic does not even describe domain name resolution and (2) the servers that receive the messages in the Abjanic system are XML servers. In other words, the conversion of the XML format to text in the Abjanic system would undermine the operation of the XML servers, which presumably require the XML format. Clearly, such a modification would not make any sense in the Abjanic system, and underscores the basic inapplicability of the Abjanic system to the claimed invention.

With respect to claim 40, the Examiner referred to the Ansell et al. reference, although the rejection was based on Abjanic in view of Tout. Applicants respectfully request clarification.

Claims 9, 15, 19, 28, 33, 37, 46, 47, 53 and 59

With respect to claims 9, 15, 19, 28, 33, 37, and 46, the Examiner acknowledged that Abjanic fails to disclose or suggest that the output comprises a listing of network peers identified by numeric addresses. The Examiner cited Chen, however, as describing a determination of optimal router paths using update messages that identify peer routers. On this basis, the Examiner concluded that it would have been obvious to modify the Abjanic system to provide output listing IP addresses of network peers to allow a router to access its neighboring peers through a single interface.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, it is unclear why one of ordinary

Application Number 09/963,806

Amendment in Response to Office Action mailed January 4, 2005

skill in the art would have modified the Abjanic system to convert XML messages used for business transactions into update messages identifying routing peers. Abjanic does not even describe a router, much less a routing table identifying peer routers. Abjanic describes a message director for directing XML messages to appropriate servers equipped to process the messages in support of business transactions, and little more.

With respect to claims 47, 53 and 59, the Examiner acknowledged that Abjanic does not disclose a system module in the form of a BGP protocol module. However, the Examiner cited Chen as disclosing the use of BGP to perform routing through a network, and concluded that it would be obvious to include such a feature in Abjanic.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, it is unclear why one of ordinary skill in the art would have considered the addition of a BGP protocol module to a system that directs XML messages to XML servers. Again, Abjanic does not even describe a router, much less a routing table identifying peer routers. Accordingly, there clearly would have been no need or desire for a BGP protocol module in the Abjanic system.

Claims 35 and 36

The Examiner acknowledged that Abjanic fails to disclose a processor-readable medium comprising instructions for causing a programmable processor to render an IP address in an ASCII format. Applicants note that amended claim 35 now more clearly specifies that the IP address is rendered in a text format different from an XML-tagged format of the IP address before querying the domain name server. The Examiner cited Tan et al. as disclosing a multilingual domain name system that allows users to enter domain names in non-Unicode or ASCII encodings. The Examiner concluded that it would have been obvious to format the IP address in Abjanic into ASCII to permit non-ASCII request to be sent to DNS servers.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, as discussed above with respect to claims 8, 14, 18, 27, 32, 40 and 45, it is unclear why one of ordinary skill in the art would have modified the Abjanic system to convert the XML format of a message to text, particularly when (1) Abjanic does not even describe domain name resolution and (2) the servers that receive the

Application Number 09/963,806

Amendment in Response to Office Action mailed January 4, 2005

messages in the Abjanic system are XML servers. Clearly, such a modification would not make any sense in the Abjanic system, and underscores the basic inapplicability of the Abjanic system to the claimed invention.

Claims 48-51, 54-57, and 60-63

With respect to claims 48, 54, and 60, the Examiner apparently acknowledged that Abjanic does not disclose an OSPF protocol module, but cited Vairavan for such a teaching. The Examiner concluded that it would have been obvious to modify Abjanic to include an OSPF protocol module, in view of Vairavan, in order to support OSPF protocols to route packets to a destination using the shortest path across the network.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. Moreover, modification of Abjanic in view of Vairavan to include an OSPF protocol module would not have been obvious. Again, Abjanic does not even describe a router. Consequently, one of ordinary skill in the art, addressing Abjanic, would have had no need to consider the incorporation of an OSPF protocol module. Moreover, it is unclear how the Abjanic system would even benefit from an OSPF protocol module. The question of the shortest path across a network is irrelevant for purposes of directing XML messages, as contemplated by Abjanic.

With respect to claims 49, 55, and 61, the Examiner apparently acknowledged that Abjanic does not disclose a firewall filter module, but cited Vairavan for such a teaching. The Examiner concluded that it would have been obvious to modify Abjanic to include a firewall filter module, in view of Vairavan, in order to provide content and state filtering.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, modification of Abjanic in view of Vairavan to include a firewall filter module would not have been obvious. In particular, it is unclear where such a firewall filter module would reside within the Abjanic system. Moreover, even if Abjanic were modified to include such a feature, it is unclear how or why such a module would provide an XML-tagged IP address, or a numeric address interface in a self-describing format, as required by the claims.

Application Number 09/963,806

Amendment in Response to Office Action mailed January 4, 2005

With respect to claims 50, 56, and 62, the Examiner apparently asserted that Abjanic discloses a management server module, in the form of content-based switching decision logic 316. Accordingly, it is unclear why these claims were rejected under section 103, and not included in the 102 rejection. Nevertheless, Applicants note that the Examiner seems to have equated director 145 with a client interface, output interface 320 with a system module, and content-based switching decision logic 316 with a management server module. Yet, content-based switching decision logic 316 does nothing more than detected a pattern in parsed XML and select a server. Decision logic 316 plays no role in management of director 145 or any other device described by Abjanic. For this reason, the rejection should be withdrawn.

With respect to claims 51, 57 and 63, the Examiner acknowledged that Abjanic does not disclose a chassis module, a device configuration module or a routing protocol module, but concluded that incorporation of such features in the Abjanic system would have been obvious in view of Vairavan.

The conclusion of obviousness is in error, for at least the reasons already expressed above with respect to the rejections under section 102. In addition, the Examiner cited no teaching that would have suggested the desirability of the proposed modification of the Abjanic system. In particular, the Examiner did not explain how or why such a modification would have been desirable in a system that merely contemplates directing XML messages to XML servers. For example, it is unclear where a chassis, device configuration or routing protocols would actually be applicable in the Abjanic system.

Application Number 09/963,806
Amendment in Response to Office Action mailed January 4, 2005

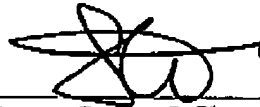
CONCLUSION

All claims in this application are in condition for allowance. Applicants respectfully request reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

Date:

By:

4-04-05



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